

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION

TRACY DEBOSE LAMPKIN,)	
)	
Plaintiff)	
)	CIVIL ACTION NO.
v.)	1:06-CV-538-WKW
)	
UNITED PARCEL SERVICE)	
)	
Defendant.)	
_____)	

**PLAINTIFF'S FIRST CONTINUING
INTERROGATORIES TO DEFENDANT**

COMES NOW, Tracy Lampkin("Plaintiff Anderson"), plaintiff in the above-referenced matter and pursuant to Fed. R. Civ. P. 33, serves this her first Interrogatories upon Defendant United Parcel Service. Defendant is required to answer these interrogatories separately and fully, in writing and under oath, and to serve a copy of responses upon counsel for this Defendant within thirty-three (33) days *after* service of these Interrogatories, Defendant is also required to supplement his Responses to these Interrogatories pursuant to the requirements of Fed.R. Civ. P. 26(e).

1.

With respect to Plaintiff *Lamkin's* discrimination and retaliation claim please explain any all information that was considered in making the decision not to promote the Plaintiff within the United Parcel Service.

2.

Please provide a list of all employees who applied and received promotions with United Parcel Service in the same unit as the Plaintiff for the period of 2004 through present. Also, please list the required documentation considered in approving their application for promotions.

3.

Please identify any training and/or in-service that United Parcel Service provided to any and all employees of United Parcel Service dealing with the issues of discrimination and retaliation from 2004 through the present.

4.

Please identify (including present whereabouts of) any and all persons employed in the same area of United Parcel Service as the Plaintiff at any time from 2004 up to and through the present.

6.

Please identify the performance evaluations periods of the Plaintiff conducted from 2004 through and including the present.

7.

Please list all full time and part time positions available in the unit in which the Plaintiff is employed from 2004 up to and through the present.

8.

Please identify a copy of any company policy or policies addressing the requirement to take a management placement test as a qualification for promotion.

This 10th day of July, 2007.

Respectfully submitted

/s/Crystal M. James
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